Remarks

In the outstanding Office Action dated February 10, 2006, claims 1 through 45 were rejected under 35 U.S.C. § 103(a). In response, the Applicants amended claims 1, 20, and 30. Claims 12 and 15 have been canceled. Claims 1 through 11, 13, 14 and 16 through 45 are pending. No new matter has been added by these amendments. In view of the amendments and the following remarks, the Applicants respectfully request reconsideration and allowance of the 'pending claims.

§ 103 Rejections

Claims 1-37 were rejected under 35 U.S.C. § 103(a) as being upatentable over Northington et al. (U.S. Patent No. 6,128,602). The Applicants respectfully traverse the rejection.

Claim 1 is Not Made Obvious by Northington

Claim 1, as amended, is directed to a system for managing a plurality of assets of a plurality of distributed enterprises. The system of claim 1 includes a database for storing asset information for a plurality of assets, "wherein each of the plurality of assets is a piece of equipment, and further wherein the asset information comprises information relating to ownership, maintenance and repair of the pieces of equipment."

Northington, in contrast, fails to teach or suggest storing asset information for a plurality of assets, wherein each of the plurality of assets is a piece of equipment, and further wherein the asset information comprises information relating to ownership, maintenance and repair of the pieces of equipment. Rather, Northington discloses a system for automatically consolidating information from a plurality of financial systems into a single accounting system. (*Northington, Abstract; col. 2, ll. 29-31*). The system provides one or more users with the ability to monitor and control financial transactions. (*Northington, Abstract; col. 2, ll. 32-41*). The consolidating and monitoring financial transactions disclosed in Northington merely places the enterprise in a position to recognize its past, current and future financial states. Nowhere does Northington teach or suggest a database for storing asset information for a plurality of assets wherein each of the plurality of assets is a piece of equipment, and further wherein the asset information comprises information relating to ownership, maintenance and repair of the pieces of equipment. As such, it would not have been obvious for one of ordinary skill in the art to use the system of

Northington to also manage physical items owned by the same entity. Thus, Northington fails to teach or suggest the invention of claim 1.

Claims Depending from Claim 1 Are Not Made Obvious by Northington

Claims 2-11, 13-14, and 16-19, which depend directly or indirectly from claim 1, incorporate all the limitations of claim 1 and are, therefore, also not made obvious by Northington. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Claim 20 is Not Made Obvious by Northington

Claim 20, as amended, is directed to a system for managing enterprise assets of a highly distributed enterprise. The system of claim 20 includes at least one computer that "tracks asset information relevant to determining a total cost of ownership for each asset, wherein each asset is a piece of equipment, and further wherein the asset information comprises information relating to ownership, maintenance and repair of the pieces of equipment."

As discussed above, Northington fails to teach or suggest at least one computer that tracks information relevant to determining a total cost of ownership for each asset, wherein each of the assets is a piece of equipment, and further wherein the information relates to ownership, maintenance and repair of the pieces of equipment. Northington merely monitors financial transactions. Thus, it would not have been obvious for one of ordinary skill in the art to use the system of Northington to also manage physical items owned by the same entity. Thus, Northington fails to teach or suggest the invention of independent claim 20. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims Depending from Claim 20 Are Not Anticipated by Northington

Claims 21-29, which depend directly or indirectly from claim 20, incorporate all the limitations of claim 20 and are, therefore, also not made obvious by Northington. Reconsideration and withdrawal of the rejections are respectfully requested.

Claim 30 is Not Made Obvious by Northington

Claim 30, as amended, is directed to a method of managing enterprise assets of a highly distributed enterprise. The method of claim 30 includes an asset identifier corresponding to each individual asset of a plurality of assets, "wherein each of the plurality of assets is a piece of equipment." Claim 30 further includes storing asset information, "wherein the asset information

comprises information relating to ownership, maintenance and repair of each piece of equipment."

As discussed above, Northington fails to teach or suggest an asset identifier corresponding to each individual asset of a plurality of assets, wherein each of the plurality of assets is a piece of equipment. Northington merely monitors financial transactions and does not teach or suggest such an asset identifier or such asset information. As such, it would not have been obvious for one of ordinary skill in the art to use the system of Northington to also manage physical items owned by the same entity. Thus, Northington fails to teach or suggest the invention of independent claim 30. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims Depending from Claim 30 Are Not Made Obvious by Northington

Claims 31-37, which depend directly or indirectly from claim 30, incorporate all the limitations of claim 30 and are, therefore, also not made obvious by Northington. Reconsideration and withdrawal of the rejections are respectfully requested.

Claims 38-45 Are Not Made Obvious by Dilger and/or McGovern

Claims 38-45 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Dilger, Karen Abramic ("Asset management, maintenance redefined"), Manufacturing Systems, v15n7, pp. 122-128, July 1997, CODEN: MASYES<ISSN: 0748-948X, JRNL CODE: MFS, Dialog file 15, Accession No. 01493159 and/or McGovern et al. (5,918,207). The Applicants respectfully traverse the rejection.

Claim 38 is directed to a method of generating service requests in a highly distributed enterprise to a plurality of service providers from a plurality of distributed asset sites. The method of claim 38 includes "automatically selecting an appropriate service provider based on the asset to be serviced" and "generating an electronic message to the appropriate service provider."

Dilger, in contrast, fails to teach or suggest automatically selecting an appropriate service provider based on the asset to be serviced and generating an electronic message to the appropriate service provider. The Examiner asserts that Dilger clearly teaches an asset management system for managing a plurality of assets of one or more enterprises. The Applicants respectfully traverse this assertion. Dilger merely discloses tidbits of information regarding specific companies and their plant maintenance systems. In fact, Dilger fails to

describe any system with sufficient clarity and detail for one of ordinary skill in the art to establish the subject matter as claimed in the present application.

The Examiner further asserts that although Dilger does not explicitly teach the steps of automatically selecting an appropriate service provider based on the asset to be serviced and generating an electronic message to the appropriate service provider, the steps would have been obvious to introduce in the system of Dilger. The Applicants respectfully disagree. In fact, Dilger, at most, merely discloses business goals for future system that allow users to request maintenance work through standard browsers. Norman Drapeau, the vice president of Project Software and Development Inc., one of the companies mentioned in Dilger, acknowledges that the *next* challenge for the company is to spread the use of maintenance management beyond maintenance departments. (*Dilger, pg. 3*). The mere statement of a future goal of a company is clear evidence that an invention is not obvious and, furthermore, not disclosed by the prior art. In fact, it shows that the state of the art had not yet recognized maintenance systems that reach further than the maintenance department. In addition to extending maintenance systems beyond the maintenance department, claim 38 goes beyond merely allowing users to request maintenance work through standard browsers. The invention of claim 38 includes "*automatically* selecting an appropriate service provider based on the asset to be serviced."

McGovern, alone or in combination with Dilger, further fails to teach or suggest automatically selecting an appropriate service provider based on the asset to be serviced or generating an electronic message to the appropriate service provider. The Examiner asserts that McGovern teaches a system and method which automatically selects a service worker capable of fulfilling a service request based on information obtained from the service request. The Applicants respectfully traverse this assertion. McGovern merely discloses a system for selecting and training candidate employees for temporary or permanent employment at a customer's facilities. That is, McGovern is clearly a system and method for job placement.

McGovern, as framed broadly by the Examiner, discloses selection of a service worker based on a service request. However, McGovern clearly discloses a more narrow system than that. In one step, McGovern teaches "the service provider determines a customer's technology direction representing where the customer will be with respect to technology in the future." (*McGovern, col. 4, ll. 23-25*). "A customer's technical direction will also represent what type of technical skills the service provider will need to provide in order to meet the customer's

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technology and business needs." (*McGovern, col. 4, ll. 25-28*). This information is saved and later used in the job placement selection process for a given candidate, whose information is stored in the service provider's candidate pool. "For example, if a customer needs to develop graphical interfaces, the service provider can determine what kinds of tools are needed for that development and what personnel exist (or need to be trained) to provide that graphical interface development." (*McGovern, col. 4, ll. 60-64*). In other words, McGovern teaches a system that automatically predicts where a customer's future technology level will be and further provides job placement to the customer using prospective employees from the service provider's candidate pool. That is, a system for predictive job placement depending on a customer's technology direction. McGovern does not teach or suggest "automatically selecting an appropriate service provider based on the asset to be serviced." Furthermore, McGovern does not teach a system whereby a particular service provider is automatically selected by the system based on an asset to be serviced and further "generating an electronic message to the appropriate service provider." Thus, for at least these reasons, neither Dilger nor McGovern, alone or in combination, teach or suggest the invention of claim 38. Accordingly, reconsideration and withdrawal of the rejection is respectfully requested.

Claims Depending from Claim 38 Are Not Made Obvious by Dilger and/or McGovern

Claims 39-45, which depend directly or indirectly from claim 38, incorporate all the limitations of claim 38 and are, therefore, also not made obvious by Dilger and/or McGovern. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.
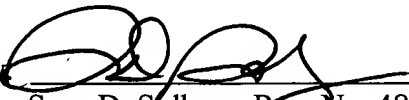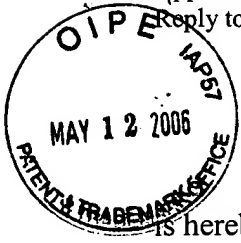
Conclusion

No additional claim fees should be generated by this paper. However, the Commissioner is hereby authorized to charge any fee deficiency associated with this paper to Deposit Account No. 04-1420.

This application now stands in allowable form and reconsideration and allowance is respectfully requested.

Respectfully submitted,

DORSEY & WHITNEY LLP
Customer Number 25763

Date: May 10, 2006   By

Sean D. Solberg, Reg. No. 48,653
(612) 340-7862